

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
AUGUSTA DIVISION

UNITED STATES OF AMERICA)

v.)

JONATHAN GARCIA LOPEZ)

) SUPERSEDING INDICTMENT

) NO. 1:20-05

) 18 U.S.C. § 922(a)(6)

) False Statement Concerning

) Information Kept by Firearms

) Dealer

THE GRAND JURY CHARGES THAT:

COUNT ONE

False Statement Concerning Information Kept by Firearms Dealer

18 U.S.C. § 922(a)(6) and 924(a)(2)

FILED
U.S. DISTRICT COURT
SAVANNAH DIV.
2020 FEB -6 PM 12:32
CLERK
SO. DIST. OF GA.

On or about April 24, 2018, in Richmond County, in the Southern District of Georgia, the defendant,

JONATHAN GARCIA LOPEZ,

in connection with the acquisition of a firearm, a SCCY, 9MM caliber pistol, Model CPX-2, serial number 633788, from AAA Gun and Pawn, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to AAA Gun and Pawn, which statement was intended and likely to deceive AAA Gun and Pawn, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant falsely represented in question 11h on an ATFE Firearms

Transaction Record, Form 4473, that the defendant was not subject to a court order restraining him from harassing, stalking or threatening a child or an intimate partner.

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

COUNT TWO

False Statement Concerning Information Kept by Firearms Dealer
18 U.S.C. § 922(a)(6) and 924(a)(2)

On or about May 18, 2018, in Richmond County, in the Southern District of Georgia, the defendant,

JONATHAN GARCIA LOPEZ,

in connection with the acquisition of a firearm, a Smith and Wesson, .40 caliber pistol, Model SD40VE, serial number FZU2671, from AAA Gun and Pawn, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code, knowingly made a false and fictitious written statement to AAA Gun and Pawn, which statement was intended and likely to deceive AAA Gun and Pawn, as to a fact material to the lawfulness of such sale of the said firearm to the defendant under chapter 44 of Title 18, in that the defendant falsely represented in question 11h on an ATFE Firearms Transaction Record, Form 4473, that the defendant was not subject to a court order restraining him from harassing, stalking or threatening a child or an intimate partner.

All in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

FORFEITURE ALLEGATION

1. The allegations contained in Counts One and Two of this Superseding Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

2. Upon conviction of the offenses set forth in this Superseding Indictment, the defendant, **JONATHAN GARCIA LOPEZ**, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearm and ammunition involved in the commission of the offense, including, but not limited to, a SCCY, 9MM caliber pistol, Model CPX-2, serial number 633788, and a Smith and Wesson, .40 caliber pistol, Model SD40VE, serial number FZU2671 .

3. If any of the property described above, as a result of any act or commission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c).


(Signatures appear on the following page)

A True Bill.



Bobby L. Christine
United States Attorney

Tara M. Lyons
Assistant United States Attorney
*Lead Counsel



Karl I. Knoche
Assistant United States Attorney
Chief, Criminal Division